The rules should make it clear the parties will not be allowed to avoid this obligation by having an expert cite prior studies for which he no longer possesses all of the underlying data, as US West did with regard to a discovery request in the 1990 Represcription Proceeding.[23/] It is also important that parties not be allowed to avoid the obligation to provide both hard copy and machine-readable versions of any data or statistical analyses that are stored in computer memory or files. In the 1990 Represcription Proceeding, NYNEX was excused from compliance with a document request for machine-readable data that it had in computer memory storage, simply because it had not already created a machine-readable copy of such data.[24/] Since it requires virtually no effort to create a machine-readable version of data stored in computer memory, and since the LECs could exploit such a ruling by making sure not to create machine-readable copies of any data, the rules should explicitly preclude the use of this type of disclosure "loophole" in the future.

Because of the voluminous nature of some of the data and analyses that will be subject to such a disclosure requirement, the mechanics of disclosure in a notice and comment proceeding will be more complicated than the conduct of discovery in formal

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[23/] See Order, 1990 Represcription Proceeding, DA 90-821 (released June 8, 1990) (June 8 Order), at ¶¶ 14-15 (excusing US West from compliance with discovery request for study cited by its expert but not in his possession).

[24/] Id. at ¶ 28.

complaint actions. There are no "parties," as such, in a notice and comment rulemaking, and thus no one to "serve."[25/] One possible approach might be to file with the Commission hard copies of all data and documents cited or relied upon in a pleading and require the filer to make available, on a next-day basis, to all other parties filing pleadings that submit a request in writing, machine-readable versions of any data and analyses in computer files or memory storage.

The use of Bureau information requests should certainly be retained to deal with unforeseen categories of data that go beyond the data filed by the LECs at the outset of the proceeding and data relied upon in pleadings. The Commission should not confine such requests to particular categories of data and should be open to written suggestions by any party throughout the represcription proceeding regarding data that should be requested from any other party or parties.

Requiring the automatic filing of data and documents relied upon in a pleading and use of Bureau information requests would not entirely preclude the need for discovery. There will always be a need for discovery, for example, of data and documents upon which a party relied but did not cite in a pleading, or which the

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[25/] See NPRM at ¶ 34.

party considered but rejected.[26] It would be unwieldy to require such material to be filed with every pleading, but that should not foreclose discovery thereof. Material subject to discovery should be filed and/or made available to all, in the same manner as material filed with pleadings.

MCI does not agree with the Commission's proposal that permissible discovery should not include interrogatories.[27] First, the Commission cannot actually mean that, since documents must be identified in response to interrogatories if their production is to be useful.[28] Second, interrogatories are useful in learning the basis for a party's or an expert's assertion or conclusion where no documentary source has been cited. There may be no documentary support for the assertion, but learning that fact is useful in itself. Thus, it would be too confining to eliminate interrogatories as a discovery tool, and document production would be rendered less useful by such elimination.

MCI believes that discovery procedures should be modified for optimal utility in the proposed represcription procedural

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[26] See June 8 Order at ¶ 44 (requiring identification of "materials [experts] ... used, ... materials they considered (and possibly rejected), and ... materials they relied upon ....").

[27] NPRM at ¶ 36.

[28] See June 8 Order at ¶ 18 (requiring adequate identification of documents produced in response to interrogatories and document requests).

context. Discovery that is not opposed should be answered without any need for an order, just as in formal complaint proceedings. Because of the timing constraints imposed by the comment schedule, parties should be required to either object to or answer discovery requests within two weeks of the service thereof. In the event the Bureau grants a contested discovery request, the party on whom the discovery was served should respond in one week. For the most part, the comment and discovery schedules proposed herein should enable parties to secure the discovery they need before they have to file the next round of pleadings (reply or rebuttal comments). All discovery responses should be filed with the Commission and served on the discoverant so that if the discovery response is received after discoverant's rebuttal comments are filed, the Commission will still have access to the discovery responses in its review of the pleadings.

Assuming that the Commission eliminates the notice of appearance in represcription proceedings, it will be necessary to take other steps to ensure the timely service of discovery requests, objections and responses. The tight time constraints of represcription proceedings would probably best be served by personal or overnight delivery or facsimile transmission of all discovery pleadings and responses. Use of first class mail would defeat the short discovery response schedule proposed here.

4. Mandatory Participation

This portion of the NPRM[29/] involves the issue raised in the introduction to these comments -- namely, the potential impact of these procedures. If, as MCI believes, the authorized ROR prescribed pursuant to these procedures might be subsequently incorporated into the sharing mechanism and lower adjustment mark of the LEC price cap scheme, the impact of the ROR represcription will be industry-wide, although less direct in the case of the price cap LECs. A determination as to which LECs should be required to participate and to file data at the outset of the proceeding should await a decision as to what the ultimate coverage of these procedures will be.

Pending such a determination, the use of NECA as a data collection, processing and filing entity for the LECs in represcription proceedings appears to be a useful proposal.[30/] NECA could perform such a role whether or not RHC data were to be used.

C. Cost of Capital Methodologies

1. Cost of Equity

MCI agrees that the Commission's Part 65 Rules should continue to allow flexibility in the cost of equity component of

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[29/] NPRM at ¶¶ 40-42.

[30/] Id. at ¶¶ 41-42.

the cost of capital determination.[31] The Commission should not adopt "presumptive methodologies" or in any other way restrict its discretion to accord weight to one or more cost of equity methodologies at the time it represcribes the ROR.

The need for such flexibility is underscored by the first methodological issue raised in the NPRM, namely, the appropriate surrogate for LEC interstate access services.[32] Unless and until the Commission determines the probable impact of the represcription procedures, which turns on the possible use of the prescribed ROR in the price cap scheme, it will not be possible to choose appropriate surrogates. It is therefore difficult at this time to advocate that data for any one set of surrogates -- whether RHCs, the S&P 400 or some other set -- should or should not be filed by the LECs at the outset of the proceeding. It might be best at this point to require the filing of data for a wide variety of surrogates, applying a "classic" DCF formula to each, and leaving the weighing of such data and estimates for determination in the represcription proceeding itself.

Some methodological choices, however, are clear. For example, MCI agrees with the Commission that Section 65.400 of the Rules should be repealed, as there seems to be no way to identify, ahead of time, criteria that will always select a set

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[31] Id. at ¶ 47.

[32] Id. at ¶¶ 48-50.

of firms "comparable to" LEC interstate access services.[33/] Indeed, the specifying of comparability criteria, as set forth in Section 65.400, is the type of determination that can only be made at the end of a represcription proceeding, not at the outset in the procedural rules. It may be possible in the future for parties to isolate truly comparable firms using new criteria, but the Commission should not prejudge the issue now by suggesting comparability criteria in its rules. MCI also agrees that the "historical" DCF formulas should be deleted from the Part 65 Rules.[34/] The use of stale "historical" data defeats the purpose and main advantage of the DCF, which is to measure the current cost of equity.

MCI agrees that the "classic" DCF should continue to be applied in future represcription proceedings,[35/] and in the same way as it was applied in the 1990 Represcription Order, for the reasons stated therein. Thus, the annual dividend used in the DCF formula should be increased by one-half the median Institutional Brokers Estimate System (IBES) growth estimate;[36/] the median IBES growth forecast should be used;[37/] the dividend

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[33/] Id. at ¶¶ 52-53.

[34/] Id. at ¶ 56.

[35/] Id. at ¶ 57.

[36/] Id. at ¶ 62.

[37/] Id. at ¶ 63.

in the DCF formula should not be compounded quarterly;[38] and there should be no adjustment for "flotation costs."[39]

Not only have the LECs failed to demonstrate the need for a flotation adjustment in the last two represcription proceedings, but the resulting lack of any investor expectation of such an adjustment itself has inevitably come to be reflected in LEC stock prices. To the extent that there really are flotation costs that might affect LEC cost of equity that are not recognized in represcription proceedings, stock prices are and will be commensurately lower, thus increasing the cost of equity as measured by the DCF. The problem, if there is one, is therefore self-regulating, and any attempt now to make another adjustment in the rules for flotation costs will simply be discounted by the market, washing out the effect of such adjustment.

In using the DCF of certain quartiles of the S&P 400 as a "benchmark" for assessing the reasonableness of other cost of equity estimates,[40] the Commission similarly must be careful not to cast any particular benchmark in concrete at this point. In the 1990 Represcription Order, the RHCs' cost of equity was found to be between the lowest and second lowest quartile of the S&P

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[38] Id. at ¶¶ 64-65.

[39] Id. at ¶¶ 66-67.

[40] Id. at ¶¶ 58-60.

400, but that was only because of an upward adjustment in the RHCs' cost of equity in recognition of the "cellular factor."[41/] It is impossible to know at this point whether such a cellular adjustment will be appropriate in the future. Such a determination will have to await an analysis of financial analysts' reports and other data in any future represcription proceeding in order to determine the impact of cellular or other nonregulated operations on stock prices and growth estimates.

Without knowing whether such an adjustment will be appropriate, the Commission cannot specify in its rules any particular "range" of DCF estimates, including the "range defined by" the first and second quartiles of the DCF estimates for the S&P 400.[42/] It may well be that without any cellular adjustment, the best benchmark for the cost of equity of interstate access service is the lowest quartile of the S&P 400, or lower. The Commission should therefore simply require the LECs to submit, at the outset, classic DCF data for each quartile of the S&P 400, without favoring any portion thereof as a possible benchmark.

MCI believes that the Commission should take a similarly flexible view toward risk premium analyses.[43/] Although the risk premium analyses presented by the LECs in the 1990 Represcription

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[41/] Id. at ¶ 59.

[42/] Id. at ¶ 60.

[43/] Id. at ¶¶ 68-75.

Proceeding were unacceptable,[44] it is conceivable that the use of more reasonable risk premiums might result in analyses that could be accorded more weight in the future. At this juncture, however, it would be a mistake to prejudge such presentations by blessing or condemning certain risk premium approaches in the Part 65 rules. Parties should be free in the future to develop and present whatever risk premium analyses they believe will withstand scrutiny, either as independent measures of the cost of equity or as benchmark comparisons. The Commission should not, however, incorporate any risk premium analysis into its rules and should not require the LECs to submit any risk premium analyses at the outset of the proceeding.

2. Cost of Debt and Capital Structure

The determination of the cost of debt[45] raises again the issue of the probable impact of the ROR represcription. If the price cap LECs will be affected, albeit indirectly, by the ROR prescribed under the revised Part 65 procedures, then RHC debt costs should play a role in establishing the cost of debt for ROR purposes. As an alternative, it might be preferable to use a composite of the embedded costs of debt of holding companies that own LECs earning revenue of $100 million or more annually,

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[44] Id. at ¶ 70.

[45] Id. at ¶¶ 76-80.

including the RHCs.[46] As for some other proxy for the cost of debt of interstate access services, the Commission should not commit itself to a binding methodology until it has studied the cost of such debt and determined how to isolate such debt costs. There is nothing in the record at this point to show, for example, that a random sample of corporate bands rated Aa or better would approximate the cost of debt of interstate access service.[47]

A determination of the appropriate capital structure[48] presents similar problems. The RHCs' capital structures should be at least a partial consideration if the prescribed ROR is going to play any role in the price cap scheme. Once again, the best compromise might be to use the capital structures of holding companies of LECs earning revenues of $100 million or more

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[46] As the Commission pointed out in the 1990 Represcription Order, 5 FCC Rcd at 7510-11, ¶¶ 31-34, it would not be prudent to use the capital structure of operating telephone subsidiaries in calculating the cost of capital, since that would provide incentives to manipulate the capital structures of the RHCs (or LEC holding companies) to inflate the measure of the overall cost of capital and because most of the holding company debt supports the telephone operations. Since the holding company capital structure should be used, the overall holding company cost of debt, rather than the operating subsidiary cost of debt, should be used in calculating the cost of capital.

[47] See NPRM at ¶ 80.

[48] Id. at ¶¶ 83-86.

annually, including the RHCs.[49] Such a group would encompass all large and medium-sized non-price cap LECs as well as the RHCs.[50]

D. Enforcement Mechanisms

MCI opposes the Commission's tentative decision to repeal the "automatic refund rule."[51] Given the large number and relatively small size of most of the non-price cap LECs, the tariff review and formal complaint processes will be extremely unwieldy and inefficient tools for enforcing the ROR prescription against the non-price cap LECs.[52] Indeed, forcing ratepayers to fend for themselves in such a manner will virtually guarantee that ROR prescription violations on the part of non-price cap LECs will generally go unremedied. Thus, the Commission has it backwards in suggesting that the small proportion of LEC interstate access revenues remaining under ROR regulation makes

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[49] Id. at ¶ 85. As explained in note 46, supra, the operating LECs' capital structures should not be used. See NPRM at ¶ 83.

[50] It may be that, in the future, LEC capital structures will become so equity-laden or in some way so divergent from traditionally acceptable limits that the Commission will want to use an a priori capital structure. See NPRM at ¶ 86. Although the Commission should keep an open mind on this issue, there is probably no need to use an a priori structure at this time. If LEC capital structures do change in the future, there may be valid economic, non-manipulative reasons for such changes, justifying continued use of the actual structures.

[51] NPRM at ¶98.

[52] It must be kept in mind that these processes are especially resource-intensive, including Commission resources.

the automatic refund rule less necessary.[53] On the contrary, the number and size of the ROR-regulated LECs makes that mechanism the only efficient remedy for ROR prescription violations.

If the Commission does decide to retain the automatic refund rule, it should continue to provide for refunds on an access service category basis. The rationale for the Automatic Refund Decision,[54] to the extent it was ever valid, has been completely nullified by the Commission's clarification in the 1990 Represcription Order of its understanding of its ROR prescription. The prescribed ROR is not (and, as the LECs know, really never has been) a minimum at all; only a maximum.[55] Moreover, a carrier could be driven somewhat below the authorized ROR by refund orders without being subject to confiscation, since there is a "substantial gap" between the authorized ROR and the point at which earnings would not be sufficient to attract capital.[56] Accordingly, a service category refund rule would be fully responsive to the court's invitation in the Automatic Refund Decision to "fashion ... a refund mechanism that does not

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[53] NPRM at ¶ 99.

[54] AT&T v. FCC, 836 F.2d 1386 (D.C. Cir. 1988).

[55] See FPC v. Natural Gas Pipeline Co., 315 U.S. 575, 590 (1942) (carrier has only an opportunity to earn the prescribed ROR; it does not have a right to such return). See also, FPC v. Tennessee Gas Transmission Co., 371 U.S. 145, 153 (1962).

[56] 1990 Represcription Order, 5 FCC Rcd. at 7532, ¶ 217.

contradict the Commission's understanding of its rate of return prescription."[57/]

Since the ROR prescription is not a minimum, and there is a "substantial gap" between the prescribed ROR and the point at which returns would become confiscatory,[58/] a rule that required automatic refunds of overearnings in one category without recoupment of underearnings in other categories would not be "inconsistent with the rate of return prescription it purports to enforce."[59/] The Commission's clarification of its understanding of its ROR prescription would therefore allow a repromulgated automatic refund rule, requiring service category refunds, to survive judicial review.

In order to help ensure a successful defense of any judicial challenge, the Commission should probably review the range of fluctuations in non-price cap LEC returns, overall and by service category, before establishing the "buffer" zones for overall and category refunds. The Commission might also consider a special waiver process as part of the automatic refund rule, permitting LECs to petition for partial or total excusal from refund obligations upon a showing that such refunds will have a confiscatory effect. Sufficiently wide buffer zones and a waiver

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[57/] AT&T v. FCC, supra, 836 F.2d at 1393.

[58/] 1990 Represcription Order, 5 FCC Rcd. at 7532, ¶ 217.

[59/] AT&T v. FCC, supra, 836 F.2d at 1390.

process will provide "escape hatches" that will ensure that the resulting refund mechanism "'viewed in its entirety' ... produce[s] a just and reasonable 'total effect' on the regulated business."[60/] The Commission therefore should not shy away from repromulgating its automatic refund rule, with modifications, as the most effective ROR enforcement mechanism.

Although the automatic refund rule previously permitted the LECs to make refunds either through prospective rate reductions or direct payments,[61/] it would be preferable to simply require direct payments to access service customers. The problem with rate reductions is that they are "reductions" from hypothetical LEC rates that supposedly would have been charged in the absence of a refund obligation. There is no way of knowing, however, what the hypothetical "full" rate would have been.

It could be argued that the LEC, in calculating its earnings, must take into account refund obligations from prior periods, and that the refund for the prior period thus forces a real reduction in current earnings, and therefore in current rates. It can never be known, however, what the current level of earnings otherwise might have been in the absence of a refund obligation. If the LEC overprices certain services, for example,

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[60/] Id. at 1391-92, quoting FPC v. Hope Natural Gas Co., 320 U.S. 591, 602 (1944).

[61/] See 47 C.F.R. ¶ 65.703(b).

thereby reducing demand, earnings for that category might have been reduced below the authorized ROR plus buffer anyway, irrespective of any refund obligation. A "refund" in that service category thus would have no impact, and ratepayers would never receive any benefits of such a paper refund.[62/] To ensure that access ratepayers actually receive the benefit of refunds, they therefore should be paid directly to the ratepayers, rather than carried out through hypothetical rate reductions.

Moreover, direct payments to customers would be less burdensome, in terms of Commission resources, than the continual monitoring that would be required in the case of prospective rate reductions. In a similar situation, the Commission recently had to monitor NYNEX's refund, by means of rate reductions, implementing a Consent Decree regarding alleged overcharges stemming from NYNEX's dealings with its MECO affiliate. MCI pointed out, in petitions to suspend and investigate the tariffs implementing the refund, that the proposed refund was a product of NYNEX demand forecasts, and that if those forecasts were incorrect, the entire amount would not be refunded. The Commission agreed that NYNEX should report to the Commission concerning the actual amount refunded as a result of actual

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[62/] To make matters worse, in that hypothetical, they would have the added burden of higher rates than they should have been paying.

demand.[63] Having to monitor refunds by all non-price cap LECs in a similar manner would be a gargantuan task, and one that could not be avoided if the Commission allowed refunds to be accomplished by means of rate reductions. Direct payments to customers thus would be both a more effective and more administratively efficient ROR refund mechanism.

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Dated: September 11, 1992

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[63] New England Tel. & Tel. Co. Tariff F.C.C. No. 40 and New York Tel. Co. Tariff F.C.C. No. 41, Transmittal Nos. 1100, 1104 and 1095, DA 90-1762 (released Nov. 30, 1990), at ¶¶ 2, 5.

CERTIFICATE OF SERVICE

I, Karen E. Dove, hereby certify that copies of the forgoing "COMMENTS," in Case No. 92-133, were served by first-class mail, postage prepaid, unless otherwise noted, this 11th day of September, 1992 on the persons listed below:

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